

EXHIBIT C

**Excerpts from the January 17, 2019 Deposition of Douglas Boothe
(former Executive VP and CEO of an Actavis Generic Defendant)**

- “Q. Are you aware of what marketing tools were used by Actavis to drive sales of its generic drugs, including opioids, while you were at the company? . . . A: . . . ***generic drugs generally don’t do a lot of marketing . . . [a]gain, the marketing department predominantly did forecasting.***” Deposition of Douglas Boothe (“Boothe Dep.”), Dkt No. 1975-6, at 146:21-147:10 (emphasis added).
- “[T]he bulk of the marketing team . . . is mostly product forecasting and then working very closely with supply chain organization to make certain that the supply chain organization knew the forecast, the volume forecast, so they could build accordingly.” *Id.* at 148:19-149:4 (emphasis added).
- “[S]o what we would do, again, potentially is ***we would put a print ad***, so therefore an advertisement, ***to announce a product approval or a product becoming available.***” *Id.* at 150:2-9 (emphasis added).
- “Q: Do you recall that Kadian sales reps were used to market oxymorphone ER at all? . . . A: Oxymorphone ER, I believe there was a period of time when ***we asked the Kadian sales team to send a message, or to deliver a message of availability that that product was still available.*** I don't think that would be -- in my world, constitute as marketing or promotion. ***It was a availability reminder.***” *Id.* at 219:4-15 (emphasis added).